

PRIVILEGED AND CONFIDENTIAL

West Virginia and Ohio PFAS Drinking Water Contamination from the DuPont/Chemours Washington Works Facility

Subject: In response to current science, changed circumstances, new site-specific information, and EPA's May 2016 issuance of a Lifetime Health Advisory for PFOA, on January 6, 2017, EPA Regions 3 and 5 amended a 2009 SDWA Consent Order (Amendment) to address health risks posed by the presence of PFOA in drinking water sources in both West Virginia and Ohio.

Background: The DuPont Washington Works facility (Facility) in Parkersburg, West Virginia, released PFOA into the environment starting in 1951. Site-specific health data shows the average blood serum concentration of PFOA in residents living in the vicinity of the Facility is 6 times higher than the average US population PFOA blood serum concentration, and approximately 20 times higher than blood serum concentration in residents living downstream from the Facility. The site-specific half-life for PFOA in blood serum ranges from approximately 2 to 10.9 years. In addition, site-specific health studies conclude residents living in the vicinity of the Facility experience increased adverse health effects from exposure to PFOA, including liver toxicity, kidney toxicity, developmental effects, immune effects, and cancer.

In 2002, 2006, and 2009, Regions 3 and 5 entered into emergency orders on consent with DuPont to address PFOA contamination in public and private water supplies in Ohio and West Virginia communities in the vicinity of the Facility in West Virginia. Each order set a PFOA action level at or above which DuPont was required to provide alternate drinking water, both temporary and permanent. Each successive order superseded the prior order and established a lower action level as a result of evolving science demonstrating health effects at exposure to lower and lower levels of PFOA.

2017 Amendment: The Amendment added The Chemours Company ("Chemours"), formerly a wholly owned subsidiary of DuPont, to the 2009 Order, and required both DuPont and Chemours to take additional actions to reduce exposure to PFOA in drinking water for residents in Ohio and West Virginia living near the Facility. These actions included the swift identification of residents exposed to PFOA at levels above the site-specific action level and the provision of temporary drinking water, followed by the provision of a permanent, alternate supply of potable drinking water. In order to provide adequate and permanent supplies of potable drinking water to the affected residents, the Amendment requires the installation and continued maintenance of Granulated Activated Carbon (GAC) for affected public water systems, and the connection of residents using private wells for their drinking water to public systems, if possible. In situations where connection to public water systems is not practicable, residents are provided with individual residential GAC systems.

Current Status: Chemours is complying with the terms of the Amendment. In 2013, DuPont phased out use of PFOA at the Facility and replaced it with GenX. Recent ORD sample results show GenX in surface water near the Facility as well as up to 20 miles away. Regions 3 and 5 collaborated on a letter that Region 3 sent to Chemours on January 11, 2018, requesting that Chemours sample for GenX in a small number of drinking water supplies in Ohio and West Virginia that have historically had high concentrations of PFOA.